BINER
DATA

INDUSTRY INTELLIGENCE REPORT

The rules now expect a go-between

Week 44 · 26 October 2026

This week in 60 seconds

For years, access to repair information was something each manufacturer arranged its own way. The new Annex X rules go a step further. They describe a route that runs through a third party, and the deadlines for it are now in the diary.

01 ANNEX X WRITES IN A THIRD PARTY

From 23 June 2027, independent repairers will request VIN-specific repair information through a third party acting under an agreement with the manufacturer. The same route applies to viewing and updating electronic maintenance history.

02 CHINESE BRANDS HIT A RECORD SHARE

Chinese brands took a record 14.5% of Europe's new-car market in September, according to preliminary Dataforce figures. Every one of those cars will need repair information when it reaches a workshop.

03 BATTERY PASSPORT ACCESS RULES OUT FOR COMMENT

The Commission has opened a consultation on its draft rules for who may access the restricted data in battery passports. The passport itself becomes mandatory on 18 February 2027.

The question is no longer only what to share.
It is who sits between the manufacturer and the workshop.

What this means for Biner Data

The regulation now assumes that someone stands between the manufacturer and the independent operator, checking who is asking and passing on what they are entitled to.

01 THE GO-BETWEEN IS PART OF THE RULES

From June 2027, VIN-specific requests and maintenance-history updates run through a third party under an agreement with the manufacturer. Each manufacturer needs that agreement in place.

02 ONE OBLIGATION, SEVERAL COMPANIES

The duty to give access stays with the manufacturer, but questions from workshops and fleets often land with the importer or the dealer. Someone has to connect the two.

03 58 DAYS TO THE NEXT DEADLINE

On 23 December, independent diagnostic tool makers must get the software, web services or information they need for variant coding, parts pairing and reprogramming.

Biner Data is the neutral layer between manufacturers and the companies that need their data, set up once rather than brand by brand.

RMI COMPLIANCE

From June 2027, access runs through a third party

Delegated Regulation 2026/699 describes how independent repairers will reach some of the most detailed repair information. They will not go to the manufacturer directly. Their request goes through a third party that has an agreement with the manufacturer.



WHAT GOES THROUGH THIS ROUTE FROM 23 JUNE 2027

VIN-specific information

Information packages available only per vehicle, for the ISO 18541 use cases 5.3 and 5.4.

Maintenance history

An API to view and update the electronic service record, with the customer's agreement.

01 WHY IT MATTERS

Each manufacturer needs agreements with the third parties that carry these requests, and the processes to vet, log and answer them. Done brand by brand, that work is repeated for every manufacturer on the market.

The regulation does not name the go-between.
It only says there has to be one.

MARKET SIGNAL

One obligation, several companies

Many of the brands arriving in Europe sell through importers and dealer groups. The duty to give independent operators access to repair information stays with the manufacturer, but the day-to-day questions land elsewhere.

ROLE	WHAT IT DOES	REPAIR INFORMATION
Manufacturer	Holds the type approval and is responsible for the vehicle meeting EU rules.	Owns the duty to give independent operators access.
Manufacturer's representative	Represents a manufacturer based outside the EU towards the authorities.	Does not take over the manufacturer's responsibility.
Importer	Places vehicles from outside the EU on the EU market and checks that they comply.	Depends on the manufacturer's information to support workshops.
Dealer	Sells and services the cars locally.	Usually the first to hear when a workshop or fleet cannot get the data.

In some cases the rules treat an importer or distributor as the manufacturer, for example when no manufacturer's representative can be identified in the EU.

The obligation sits with one company.
The questions arrive at another.

AFTERMARKET SIGNAL

The aftermarket grows in value, not volume.



Boston Consulting Group expects the European aftermarket to grow by 1.7% a year until 2035, against 4.7% a year between 2021 and 2025. The car parc grows only slowly, and electric cars need less routine maintenance. Growth comes from more complex work on each car.

---

01 WHY IT MATTERS

More complex repairs need more detailed information. Delegated Regulation 2026/699 now explicitly includes calibration information for driver-assistance systems and information on diagnosing and repairing traction batteries. BCG also expects fleets to make up 20% of the car parc by 2035, up from 8% in 2021.

02 THE BIGGER QUESTION

When each repair is worth more and depends on more data, how quickly can a workshop get the right information for a brand it has never serviced before?

Fewer repairs, each one more dependent on data.

COMPLIANCE CALENDAR

The dates to keep in view

Counted from Monday 26 October 2026.

Now
open

Battery passport access rules

The Commission's draft on who may access restricted battery passport data is out for public feedback.

58
days

23 December 2026

Annex X. Software, web services or information for independent diagnostic tool makers, covering variant coding, parts pairing and reprogramming.

115
days

18 February 2027

Battery passport mandatory for EV batteries placed on the market.

240
days

23 June 2027

Annex X. VIN-specific information and the maintenance-history API through a third party. Tool-maker access extends to types approved from September 2020 to July 2022.

2028

31 May and 23 June 2028

The motor-vehicle block exemption expires on 31 May. From 23 June, Annex X also covers work that depends on software updates.

The next date is 58 days away.
The ones after it are already set.

BINER
DATA

THE BIGGER PICTURE

The rules now expect a go-between.

Access is meant to run through someone both sides can rely on.

This week's signals point the same way. Annex X describes a third party between the manufacturer and the workshop. The brands arriving in Europe split the work between manufacturer, importer and dealer. And each repair is worth more and depends on more data. The obligation is clear. Who carries it out in practice is the open question.

Set up once, the go-between serves every brand. Set up brand by brand, it becomes the burden.

SOURCES & NOTES
MARKET INTELLIGENCE

DELEGATED REGULATION (EU) 2026/699

EUR-Lex, Official Journal L, 3 June 2026, Annex X point 6.1.1. Taylor Wessing, July 2026.
Transconnect, October 2026.
The third-party route for VIN-specific information and maintenance history, and the deadlines.

NEW-CAR REGISTRATIONS

ACEA, 22 October 2026. Dataforce preliminary figures via Automotive News Europe, October 2026.
Chinese brands' share of the European market in September.

BATTERY PASSPORT

European Commission consultation on the draft implementing regulation on access rights, reported by LexisNexis, 20 October 2026. European Commission, battery passport FAQ.
Who may access restricted battery passport data.

RESPONSIBILITIES UNDER TYPE APPROVAL

EUR-Lex, Regulation (EU) 2018/858, Articles 20 and 61.
Roles of manufacturers, representatives, importers and distributors, and the duty to give access to repair information.

EUROPEAN AFTERMARKET

Boston Consulting Group, The European Aftermarket in 2035, 3 September 2026.
Market value, growth rates and fleet share.

COMPETITION LAW

EUR-Lex, Commission Regulation (EU) 2023/822.
Expiry of the motor-vehicle block exemption on 31 May 2028.

EDITORIAL NOTE

This report combines publicly available information with Biner Data analysis. References to companies do not imply a commercial relationship. Regulatory summaries are for industry intelligence purposes and do not constitute legal advice.

CHART NOTE

Page 6 chart by Biner Data, based on figures published by BCG.

BINER
DATA

THANKS FOR READING

Regulated data, simplified.

Biner Data runs the layer between data holders and data users. Access is granted, logged and revoked in one place.

binerdata.com